

October 16, 2013

Mr. Scott Farmer
North Carolina Housing Finance Agency
3508 Bush Street
Raleigh, NC 27609

Subject: Comments on Qualified Allocation Plan for 2014

Dear Mr. Farmer:

Thank you for accepting and considering these comments on the Agency's 2014 Qualified Allocation Plan. These comments are grounded in our work with local governments in the Piedmont Triad region and the Regional Housing Workgroup of the Piedmont Triad Sustainable Communities Project (now called Piedmont Together).

In general we urge NCHFA and other state agencies to align their funding investments with HUD-funded Sustainable Communities plans that are underway in the Piedmont Triad and three other North Carolina regions. Our regional housing work group has identified five key policy priorities: 1) encouraging housing investment in municipalities' redevelopment areas, 2) encouraging federal and state agencies to focus their assistance and investments on 'location efficient' sites, projects within a half-mile of transit, sites with convenient access to employment centers, retail and social services, 3) treating foreclosures as assets, opportunities for restoring neighborhoods, 4) addressing homelessness on a regional scale, and 5) supporting mixed-income and mixed-use approaches to residential communities.

With this background, I offer the following comments:

1. **Increase the Rehabilitation Set-aside.** Retention of affordable housing and supporting local efforts to work with owners of aging assisted housing projects is important for many of our communities. This set-aside should not be limited to any one type of previously-assisted project, but should give preference to projects that are closely connected to local redevelopment plans and meet 'location-efficiency' criteria, including access to transit.
2. **Increase the number of Redevelopment Projects.** The QAP treatment of Redevelopment Projects is sensible, recognizing that projects in areas supported by local plans and community resources require special attention. But we urge the Agency to make more than two awards to projects in redevelopment areas. It is essential that local governments are fully-invested in revitalizing the wider area, not just the specific project site. Encouraging tax credit investment in close-in areas, convenient to jobs, transit and services, will benefit the residents of these projects and the surrounding neighborhoods.
3. **Include transit in site criteria.** Our planning for the Piedmont Triad region has raised awareness of the total cost that families pay when they choose a home or an apartment. Thinking about affordability must combine transportation costs with the cost of rent and utilities (something the Center for Neighborhood Technologies calls "H+T"). Recognizing that many counties in North Carolina have limited or no regular transit service, proximity to transit should be included and scored in evaluating sites, at least for Metro counties. This should have the effect of encouraging developers to find sites within walking distance of transit lines and giving families without a car better access to jobs and services.

4. **Keep Forsyth County and Guilford County in the METRO allocation.** Others have surely commented on this issue. We support including Forsyth County and Guilford County in the METRO area. By almost any population and density criteria, these counties are metropolitan in nature. Developers in these counties should compete with other metropolitan area applicants. Yes, at least one project should be awarded in each Metro county, with the possibility of another Redevelopment area project; but each project should be fully aligned with regional planning priorities, expressed in such plans as Piedmont Together, the GroWNC plan for the Land of Sky region, and Connect in the Centralina region, in addition to aligning with municipal priorities.

Thank you for considering these comments as the Agency refines the 2014 Qualified Allocation Plan. If you have any questions, please contact me by phone at (919) 622-3303 or by email at mneilplanning@gmail.com.

Sincerely,



William A. McNeil, AICP

on behalf of the Piedmont Together Regional Housing Work Group